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Cc: Smith, Molly[Smith.Molly@epa.gov]; Miller, Patrick[miller.patrick@epa.gov]
From: Hesse, Jennifer
Sent: Tue 10/3/2017 9:57:03 PM
Subject: RE: EPA comments on fugitive dust plan

Thanks, Nicole, Molly, & Patrick!

Jennifer

From: Cantello, Nicole [mailto:cantello.nicole@epa.gov]
Sent: Tuesday, October 03, 2017 2:55 PM
To: Hesse, Jennifer; Ames, Mort; Omenazu, Otis; Graham, Dave
Cc: Smith, Molly; Miller, Patrick
Subject: EPA comments on fugitive dust plan

Hello:

Below are EPA's comments/questions on the September 2017 FDP submitted by SH Bell. Please contact us if you would like any clarity.

- EPA would like to see additional detail on the proposed changes to the "enclosed packaging operation". It is unclear where exactly the proposed loader tunnel will be and if this tunnel is completely enclosed. How will the material be introduced into the tunnel? Will SH Bell continue to operate the dust collector for the remaining steps in box filling process? What is the estimated timeline for installation? What will the sizing and how was the sizing determined for the new baghouse.
- EPA does not know where the proposal for the "full size off-site truck unloading" of manganese continuing materials is referring to. "Off-site" from the SHB property? Does CPDH know what they are referring to?
- Is SH Bell aware of any non-misting, non-water based, structural, conveyor or enclosed barge unloading systems? Is the excavator, or construction equipment, the only way to remove bulk material from a barge? Has SH Bell considered any other removal processes?

- Has SH Bell tested all materials to confirm there is no presence of cadmium, lead or arsenic in the materials? We understand that it may not be the main constituent of the product, but trace metals often appear together.
- EPA believes the proactive reportable action levels proposed by SH Bell need to be lower.
- EPA would like to better understand the super sack unloading changes. What building is the facility now use and is the process being controlled by a baghouse? While moving indoors is a large improvement, EPA wants to make sure we are not solving one problem while creating another. Is the material still loaded into a truck and driven to the material storage area?
- It is our understanding that the Norcon baghouse structure for loading trucks was built and the baghouse is operational; however, the new structure is not connected to the Norcon building. This means that there is one area/side that is still open. So while the facility is getting control from the baghouse, it is not as much as it could get if the Norcon building was attached to the new structure.
- When were the rumble strips installed? We cannot remember ever driving over rumble strips – especially ones that would shake debris from a large truck. Is the company simply referring to the grates on the scale?

We hope this is helpful.

Best,

Nicole Cantello

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